

IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

In re

**John Herbert Tyson**  
**Carol Elizabeth Tyson**  
Debtors

Case No **93-52316**  
Chapter **7**  
Judge: **Caldwell**

**MOTION TO REOPEN CASE**

Former Trustee Arnold S. White moves the Court to re-open the case based on newly discovered assets.

Respectfully submitted,  
White & Fish LPA, Inc.

/s/ Arnold S. White  
Arnold S. White (0029018)  
Attorney for Former Trustee  
1335 Dublin Road #201 C  
Columbus, Ohio 43215  
(614)485-9300  
(614)485-9462 [FAX]  
awhite@centralohioattorneys.com

**MEMORANDUM IN SUPPORT**

When this case was closed on May 28, 2002, Trustee expressly noted that this case could be reopened in the event that an asset of the estate, i.e. The Tanquesitos partnership should later prove to be valuable. The asset was not abandoned.

Recently, Trustee received notice from Steve Whitworth, an attorney and principal of the partnership located in Texas, that the partnership had sold its primary asset, and the partnership interest to be distributed to the Debtors is \$71,793.30 which Mr. Whitworth is holding in the attorney trust account. This remains property of the estate.

Trustee moves the Court to reopen the case to administer this asset for the benefit of

creditors.

Respectfully submitted,  
White & Fish LPA, Inc.

/s/ Arnold S. White  
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CERTIFICATE OF SERVICE

I hereby certify that on the 21 day of December, 2006, a copy of the foregoing Motion To Reopen The Case was electronically served on the following registered ECF participants, electronically through the Court's transmission facilities at their email addresses as registered with the Court:

Office of the United States Trustee  
170 North High Street, Suite 200  
Columbus, OH 43215

Stephen E Schafer  
1474 Grandview Avenue Suite #400  
Columbus Ohio 43212

GMAC  
c/o Donald A Mullin  
8 E Broad Street Suite 300  
Columbus Ohio 43215

and that the following persons were mailed a copy by ordinary U. S. Mail addressed to:

John & Carol Tyson  
1921 Northwest Blvd  
Columbus Ohio 43212

Respectfully Submitted

/s/Arnold S. White  
Arnold S. White (0029018)  
Attorney for Former Trustee  
White & Fish, LPA, Inc.

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Columbus, OH 43215  
Phone: (614) 485-9300  
Fax: (614) 485-9462